## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

FILED
FEB 1 6 2022

IN THIS OFFICE Cierk U.S. District Court Greens (2.7)
By 101 6

In The Matter Of

Case No.: 1:22MC **4** 

\$11,512.00 in U.S. CURRENCY,

## MOTION FOR EXTENSION OF TIME TO FILE VERIFIED COMPLAINT OF FORFEITURE

NOW COMES the United States of America, by and through Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, pursuant to 18 U.S.C. § 983(a)(3)(A), and respectfully moves the Court to extend the time within which to file a civil forfeiture complaint against the above-named property, seized on September 16, 2021, to and including April 18, 2022, to allow for further investigation of the basis for forfeiture and evaluation of the administrative claims.

Hemal U. Patel, whose claims in the administrative forfeiture actions initiated against the above-named property, is represented by Todd A. Smith. I attempted to contact Todd A. Smith for his consent to this request for an extension, but was unable to reach him.

WHEREFORE, the United States respectfully requests that the Court grant an extension of time to file a civil forfeiture Complaint against the above-named property until April 18, 2022.

A proposed Order is attached.

This the 16th day of February, 2022.

Respectfully submitted,

SANDRA J. HAIRSTON United States Attorney

Lynne P. Klauer

Assistant United States Attorney

NCSB #13815

101 S. Edgeworth Street, 4th Floor

Greensboro, NC 27401 Phone: (336)333-5351

Email: lynne.klauer@usdoj.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2022, the foregoing Motion for Extension of Time to file Verified Complaint of Forfeiture was filed with the Clerk of the Court, and I hereby certify that I have mailed the document to the following:

## Addressee:

Todd A. Smith, Esq. Smith Giles PLLC 110 South Maple Street Graham, NC 27253

Respectfully submitted,

SANDRA J. HAIRSTON United States Attorney

Lynne P. Klauer

Assistant United States Attorney

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